

1 Justina K. Sessions, State Bar No. 270914  
2 Email: jsessions@wsgr.com  
3 WILSON SONSINI GOODRICH & ROSATI  
4 Professional Corporation  
5 One Market Plaza  
6 Spear Tower, Suite 3300  
7 San Francisco, CA 94105  
8 Telephone: (415) 947-2197  
9 Facsimile: (415) 947-2099

*Counsel for Cross-Movant and  
Respondent Snap Inc.*

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
12 **WESTERN DIVISION**

13 META PLATFORMS, INC.,

14 Movant,

15 v.  
16

17 SNAP INC.,

18 Cross-Movant and Respondent.  
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Case No. 2:22-mc-00146-PA-AGR

**SNAP INC.'S NOTICE OF CROSS  
MOTION TO QUASH META  
PLATFORMS, INC.'S SUBPOENA**

Underlying action in the United States  
District Court for the District of Columbia,  
No. 1:20-cv-03590-JEB

Fact Discovery Cutoff: May 22, 2023  
Expert Discovery Cutoff: January 5, 2024  
Pretrial Conference and Trial Date: TBD

Hearing Date: September 6, 2022  
Hearing Time: 10 a.m.  
Magistrate Judge Alicia G. Rosenberg

**DISCOVERY MATTER**

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that Cross-Movant and Respondent Party Snap Inc. (“Snap”) files this Cross-Motion to Quash Responding Party Meta Platforms, Inc.’s (“Meta”) Subpoena served on February 24, 2022 (“Subpoena”). The Subpoena was served in connection with a case pending in the U.S. District Court for the District of Columbia, *FTC v. Meta Platforms, Inc.*, No. 1:20-cv-03590-JEB (D.D.C.). Meta has moved to compel compliance with the Subpoena. ECF 1. Snap hereby notices the hearing for September 6, 2022 at 10:00 a.m.

Snap respectfully requests that the Court quash Meta’s Subpoena because the Subpoena is overbroad, subjects Snap to an undue burden, and requires disclosing a trade secret or other confidential research, development, or commercial information. Alternatively, if this Court chooses to order compliance or partial compliance with Meta’s Subpoena, Snap respectfully requests that this Court order Meta to pay Snap’s costs of compliance. Further, Snap requests that if the Court orders compliance or partial compliance with Meta’s subpoena that no Meta in-house counsel be permitted to review Snap’s highly confidential materials.

Snap’s Cross Motion to Quash Meta’s Subpoena is based on this Notice of Motion, the parties’ Joint Stipulation (ECF 1-1), the Declarations of Justina Sessions, Blair Mason, and Laura Evans In Support of Snap’s Motion to Quash, accompanying Exhibits 1-26, any supplemental memorandum to be filed in connection with this Motion, and such other additional information or argument as may be presented at or before the hearing on the Motion.

This Motion is made following videoconferences between counsel pursuant to Civil Local Rule 37-1, which took place on April 6, 2022 and June 17, 2022, and written correspondence, which took place between March 28, 2022 and July 4, 2022. During those conferences, the parties were unable to resolve the issues put forth in the parties’ Joint Stipulation.

1 A Proposed Order granting this Motion is being submitted together with this  
2 Notice of Motion.

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4 DATED: August 8, 2022

Respectfully submitted,

5 WILSON SONSINI GOODRICH & ROSATI  
6 Professional Corporation

7 By: /s/ Justina K. Sessions

8 Justina K. Sessions, State Bar No. 270914

9 Email: jsessions@wsgr.com

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Spear Tower, Suite 3300

11 San Francisco, CA 94105

12 Telephone: (415) 947-2197

13 Facsimile: (415) 947-2099

14 *Counsel for Cross-Movant and*  
15 *Respondent Snap Inc.*